

JAN 13 2006

See additional form for additional information.

Interagency Report Control No. 98

UNITED STATES DEPARTMENT OF AGRICULTURE
ANIMAL AND PLANT HEALTH INSPECTION SERVICE

1. CERTIFICATE NUMBER: 63-R-0116
CUSTOMER NUMBER: 17184

FORM APPROVED
OMB NO. 0579-0036

ANNUAL REPORT OF RESEARCH FACILITY
(TYPE OR PRINT)

Neotech Llc
10061 Hwy 22
Dresden, TN 38225

Telephone: (731) -364-5856

3. REPORTING FACILITY (List all locations where animals were housed or used in actual research, testing, or experimentation, or held for these purposes. Attach additional sheets if necessary)

FACILITY LOCATIONS (Sites) - See Attached Listing

REPORT OF ANIMALS USED BY OR UNDER CONTROL OF RESEARCH FACILITY (Attach additional sheets if necessary or use APHIS Form 7023A)

A. Animals Covered By The Animal Welfare Regulations	B. Number of animal being bred, conditioned, or held for use in teaching, testing, experiments, research, or surgery but not yet used for such purposes.	C. Number of animals upon which teaching, research, experiments, or tests were conducted involving no pain, distress, or use of pain-relieving drugs.	D. Number of animals upon which experiments, teaching, research, surgery, or tests were conducted involving accompanying pain or distress to the animals for which appropriate anesthetic, analgesic, or tranquilizing drugs were used.	E. Number of animals upon which teaching, experiments, research, surgery or tests were conducted involving accompanying pain or distress to the animals and for which the use of appropriate anesthetic, analgesic, or tranquiliz drugs would have adversely affected the procedures, res or interpretation of the teaching, research, experiments, surgery, or tests. (An explanation of the procedures producing pain or distress in these animals and the reason such drugs were not used must be attached to this report	F. TOTAL NUMBER OF ANIMALS (COLUMNS C + D + E)
4. Dogs		38	10	5	53
5. Cats					
6. Guinea Pigs					
7. Hamsters					
8. Rabbits					
9. Non-human Primates					
10. Sheep					
11. Pigs					
12. Other Farm Animals					
13. Other Animals					
Ferrets		8			8 ✓

ASSURANCE STATEMENTS

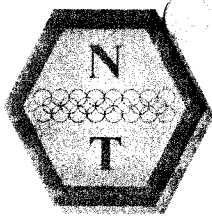
- 1) Professionally acceptable standards governing the care, treatment, and use of animals, including appropriate use of anesthetic, analgesic, and tranquilizing drugs, prior to, during, and following actual research, teaching, testing, surgery, or experimentation were followed by this research facility.
- 2) Each principal investigator has considered alternatives to painful procedures.
- 3) This facility is adhering to the standards and regulations under the Act, and it has required that exceptions to the standards and regulations be specified and explained by the principal investigator and approved by the Institutional Animal Care and Use Committee (IACUC). A summary of all such exceptions is attached to this annual report. In addition to identifying the IACUC-approved exceptions, this summary includes a brief explanation of the exceptions, as well as the species and number of animals affected.
- 4) The attending veterinarian for this research facility has appropriate authority to ensure the provision of adequate veterinary care and to oversee the adequacy of other aspects of animal care and use.

CERTIFICATION BY HEADQUARTERS RESEARCH FACILITY OFFICIAL
(Chief Executive Officer or Legally Responsible Institutional Official)

(b)(6), (b)(7)c

DATE SIGNED

1-4-06



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JAN 13 2006

United States Department of Agriculture
Marketing and Regulatory Programs
Animal and Plant Health Inspection Services
Animal Care
920 Main Campus Drive, Suite 200
Raleigh, NC 27606-5213

January 4, 2006

Dear Elizabeth Goldentyer, DVM:

On December 20, 2005, Dr. Susanne Brunkhorst (VMO, USDA, APHIS, Animal Care) conducted an inspection of NeoTech's research facilities and records. Through the inspection process, an error in the Annual Report of Research Facilities was identified. NeoTech failed to report the use of ferrets on APHIS FORM 7023. To correct this mistake, NeoTech has amended APHIS FORM 7023 for the 2005 fiscal year (October 2004 to September 2005) and is resubmitting it as Dr. Brunkhorst instructed.

Thank you,

(b)(6), (b)(7)c

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NOV 18 2005

Subject: ANNUAL REPORT, Explanation of procedures producing [REDACTED] and reasons pain relieving drugs were not used (Section E)

Neotech, LLC (registration number: 63-R-0116) conducted an experiment that caused [REDACTED] to 5 canines. This study was intended to demonstrate the [REDACTED] NeoTech's Canine [REDACTED]. This study was conducted in accordance with [REDACTED] for the purpose of licensure through the USDA, APHIS, and CVB-LPD. [REDACTED]

The Code of Federal Regulations (9 CFR) clearly and precisely states how a study of this nature is to be executed and interpreted. In this study, dogs were vaccinated with NeoTech's [REDACTED] while other dogs were not vaccinated [REDACTED] were then administered a [REDACTED] and observed for 21 days to determine if [REDACTED] occurred. If [REDACTED] associated symptoms did not occur in the vaccinated dogs, one would conclude that the vaccine prevented the normal course of [REDACTED]. This conclusion is indirectly supported by the statement in [REDACTED] of the 9 CFR which states, [REDACTED]

[REDACTED] This conclusion is supported by a sentence in [REDACTED] of the 9 CFR which states, [REDACTED]

[REDACTED] In summary, [REDACTED] of the 9 CFR requires a test that causes some dogs [REDACTED] and the success of this test is dependent on dogs [REDACTED]

Symptoms commonly observed in a dog infected with [REDACTED] [REDACTED] These symptoms cause [REDACTED]. Scientific justification for [REDACTED] was that these drugs could have prevented full expression of the abovementioned symptoms, therefore, preventing recognition and progression of [REDACTED]. NeoTech's IACUC committee and attending veterinarian approved of withholding these drugs. Use of these [REDACTED] and resulted in the erroneous conclusion that the [REDACTED]. The study would be deemed inconclusive and repeated as a result of this false conclusion.

The only acceptable method of [REDACTED] in the aforementioned study
was [REDACTED] authorizes humane

[REDACTED]